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Attorney for Defendant
NAPOLEON WASHINGTON

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

NAPOLEON CURTIS WASHINGTON,

Defendant

Case No.: 2:25-cr-00056-JAM

**STIPULATION AND ORDER TO
CONTINUE FURTHER STATUS
CONFERENCE/POSSIBLE CHANGE OF
PLEA HEARING OR SETTING OF A
TRIAL DATE**

Date: January 6, 2026

Time: 9:00 AM

Court: Hon. John A. Mendez

STIPULATION

By stipulation, the parties agree to reset the defendant's status conference from the original date of November 18, 2025, to January 6, 2026, at 9:00 a.m., and to exclude time between November 18, 2025, and January 6, 2026, with an exclusion of time, under Local Code T4.

1. The parties agree and stipulate, and request that the Court find the following:

STIPULATION AND ORDER

- a. Counsel for defendant has been involved in several hearings in state court, and was out of the county in Alturas, California for a week on a court appointed homicide matter there. It is a six hour drive from Sacramento to Alturas, California.
 - b. The parties have reached a plea agreement, but defense counsel needs additional time to finalize the plea agreement.
 - c. The government does not object to the continuance.
 - d. Based on the above-mentioned findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.
 - e. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of November 18, 2025, to January 6, 2026, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161 (h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.
2. Nothing in the stipulation and order shall preclude the finding that other provisions of the Speedy Trial Act dictate the additional time periods are excludable from the period with which a trial must commence.

1 **IT IS SO STIPULATED.**

2 Dated: November 17, 2025

Eric Grant
United States Attorney

4 Dated: November 17, 2025

/s/ CHARLES CAMPBELL
CHARLES CAMPBELL
Assistant United States Attorney

7 Dated: November 17, 2025

/s/ MARK REICHEL
MARK REICHEL
Counsel for Defendant
Napoleon Washington


12 **ORDER**

13 Based on the stipulation of the parties, the November 18, 2025 further status conference/
14 possible change of plea hearing or setting of a trial date is **CONTINUED** to **January 06, 2026, at 9:00**
15 **a.m.**, before Senior District Judge John A. Mendez.

17 Time is **EXCLUDED** through and including January 06, 2026, as described in the parties'
18 Stipulation.

19 **IT IS SO ORDERED.**

20 Dated: November 17, 2025

22 
23 JOHN A. MENDEZ,
24 SENIOR UNITED STATES DISTRICT JUDGE